

MEMO ENDORSED

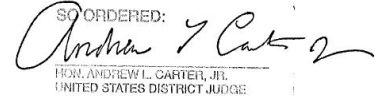
VLADECK, RASKIN & CLARK, P.C.

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November 19, 2023

Defendant's request is GRANTED.

Hon. Andrew L. Carter, Jr.
United States District Court Judge
United States District Court SDNY
500 Pearl Street
New York, NY 10007

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: November 20, 2023
New York, NY

Re: *United States v. Perry Joyner*, 21 Cr 673 (ALC)

Dear Judge Carter:

I write on behalf of my client, Perry Joyner, to request permission for him to spend one night at his older brother's home overnight on Thanksgiving with other family.

Mr. Joyner is currently on home detention and has been electronically monitored since 2021 pursuant to an unsecured \$300,000 bond co-signed by three financially responsible individuals, including his mother and his brother's fiancé. He currently lives with his mother and is permitted to attend work and church.

Mr. Joyner has been designated to a FBOP facility and will surrender on November 30, 2023. He respectfully requests permission to join his family at his brother's home on Thanksgiving November 23 and returning to his home by his curfew at 10 pm the next evening November 24, 2023. His brother will host my client's immediate family, including his mother and grandmother, his brother's fiance and one niece and nephew for the holiday.

Mr. Joyner has always been compliant with his conditions of release, he has remained complaint and employed full-time since sentencing, has paid his Special Assessment in full and has remained in contact with assigned counsel regularly. Mr. Joyner has also been permitted this privilege by the Court to spend an overnight during the holidays and has had no difficulty conforming his conduct to the law. The Government "defers to pre-trial services" on this decision. Pretrial services indicates "[p]er policy, Pretrial Services objects to overnight stay as to individuals subject to a Curfew enforced by Location Monitoring." However, also notes that "it appears that Mr. Joyner remains in compliance with the conditions of his release."

I respectfully request that Mr. Joyner be permitted to observe the holiday at his older brother's home with an overnight stay. I have provided the address and attendees to pre-trial services in the event the Court grants this application.

Sincerely,

/s/ Susan J. Walsh

cc: Aline Flodr, AUSA (By email and ECF)

